Historic England

Planning Policy
Planning Service
Medway Council
Gun Wharf, Dock Road
Chatham ME4 4TR

By email only planning.policy@medway.gov.uk

Our ref: [redacted]
Your ref:

Telephone [redacted]
Email [redacted]

Date 9 April 2020

Dear Sir or Madam

Planning for Growth on the Hoo Peninsula

Thank you for your email of 6 March 2020 inviting comments on the above consultation document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. We note that as an early stage in the formulation of a local plan the current document may be subject to significant change and consequently we consider it appropriate to limit our comments to more general matters; we will comment more specifically and in detail at later stages in the plan making process as appropriate.

In this respect, you should not take the comments below as the definitive view of Historic England on the matters contained in the framework document; they are provided for general guidance in the iterative process of preparing appropriate policies for the historic environment. In particular, it focusses on the objective of the National Planning Policy Framework, inter alia, to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 126 and 157); and contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 156).

Historic England

We note with some disappointment that the consultation document makes almost no mention of the historic environment, which we perceive potentally as a serious flaw. Notwithstanding the principle that this is an appropriate growth area, as with nearly all new garden settlements or new towns, it is essential that the initial concept is based on an appropriate understanding of the historic environment. This document seems to be focussed almost solely on the green infrastructure and landscape/ecological values of the area in isolation, and overlooks historic character and heritage significance. It needs to be a balance of all of these if it is to promote sustainable development in the terms of the NPPF.

The proposed framework needs to begin at first principles and not look to justify a concept that is already beginning to take shape. If the outcome of this consultation is to be used to next derive a more detailed masterplan for shaping development around Hoo St Werburgh then it is essential that evidence to understand historic character and significance is gathered at this early stage.

Understanding the baseline situation needs to be a zero base study and not rely on the existence (or rather lack of) of listed/scheduled assets or the number of HER entries as a proxy for heritage significance. This part of the Hoo Peninsula is an area that has not seen systematic evaluation or extensive field investigations. The closest we come to this is Historic England's work on the entire Hoo Peninsula and it is disappointing that there is no evidence that this has yet been taken on board. The study document can be accessed here: https://historicengland.org.uk/images-books/publications/hoo-peninsula-landscape/.

We carried out no intrusive investigations or extensive geophysical surveys as part of the Hoo Peninsula study, and so what is already known about archaeological significance or the potential for this is almost certainly an understatement of the true position. There will undoubtedly be a high potential for as yet unidentified archaeological remains and some of these could prove to be of a level of importance, i.e. nationally important, that they could require changes to any emerging development plan or masterplan.

If this is truly to be " A landscape led development" then it must engage with the historic landscape environment and if it is to have "an attractive and tailored built form" then it needs to understand existing historic character. What is now an essentially rural landscape will be transormed and there is little suggestion of how this can effectively or meaningfully provide cues for substantial new built forms. There is potential, alternatively, for building quality 21$^{st}$C sustainable homes and service centres that give the place a distinctive new character.

Some of the landscape proposals are no doubt included to make the new place environmentally responsive but they need to be carefully tested. Statements such as "wetlands near the Medway" and "large areas of new tree and hedge planting" need unpacking for their potential consequences upon the historic environment and specifically buried archaeology.

As keepers of the Historic Environment Record and as archaeological adviser to Medway Council, the Heritage Conservation Team at Kent County Council need to be consulted early and engaged to provide on-going advice about how best to identify and assess archaeological significance. In other locations, such as Otterpool Park in Folkestone and Hythe District, Historic England is advising that a logical sequence of desk based assessment, leading to extensive geophysical survey, and then trial trenching to clarify significance is followed. Historic England will have a role in advising whether any archaeology has the level of significance that it might be nationally important and therefore a candidate for listing (scheduling). We would advise in view of the proposed timescale for the preparation of the framework that the Council uses the accelerated listing decisions process under our Enhanced Advisory Services as a way to help the promoters achieve more clarity and certainty as the proposal is taken forward and at an early stage of this. Information on these services is available here: https://historicengland.org.uk/services-skills/our-planning-services/enhanced-advisory-services/.

Hoo St Werburgh has a grade I listed medieval church and a handful of grade IIs. The church is held to be named for an Anglo Saxon monastery associated with St Werburgh, a 7thC Mercian princess. Finding archaeological remains of this could be very significant. The village grew significantly in the 20thC as a result of people coming to work on Hoo in the oil depots and power stations. It has a historic core but is not a conservation area. Its historic character should nevertheless be studied and better understaood. The existing air photography was comprehensively assessed by our specialists as part of our own Hoo work and this will help the desk based assessment process. Only new photography since our work needs to be added and the features we identified can inform where more detailed survey including by geophysics is needed.

A specific issue is the WW2 Hoo Stop Line which is part of the very long national GCHQ line where it runs across the Hoo peninsula. It starts at the edge of the Medway east of Hoo St Werburgh and runs initially south to north. It consisted of an anti-tank ditch and hardened components (i.e. pillboxes). Several of the latter are already listed (grade II) and others may be under consideration for listing. Listing takes place for pillboxes where these form coherent groups of surviving examples in relation to a remnant landscape that they were designed to defend . The Hoo stop line is considered one of the better preserved defence areas in England and it needs to be taken into account by future development. Perhaps the line of the anti-tank ditch might now become a routeway through development to help people understand the defences and the pillboxes should be preserved each with a sufficient setting.

High Halstow also has a medieval grade I church but is not a conservation area. Its historic character needs to be understood and planned for if it is to be connected to the main area of development to its south. Other land around it will come under pressure as a result of such major growth as is proposed.

The idea of re-using the Hundred of Hoo railway line (currently freight only) seems a sound one and we think the railway itself should be treated as a non-designated heritage asset. It

had a junction at Shamal Street with the narrow gauge War Department railway that served the large armament depots to the north.

The suggestion of creating wetlands close to the Medway requires further investigation and understanding of its purpose. Is this led by ecological justifications or as a way of delivering flood defences? At the waters edge east of Hoo St Werburgh and within Port Werburgh there is an incredible assemblage of hulked vessels – both timber and metal. The full significance of these is not yet understood but they represent a potentially significant resource, and a major recording task if it is decided to remove them or should the development proposal affect them in some other way.

Any managed set back of the current river frontages will need the archaeological implications to be first understood and taken into account. There have been such schemes on the Hoo Peninsula for environmental mitigation of the new port in Essex and adjacent to that port itself. It is not as simple as breaching the existing flood walls and letting flooding take place. Digging of new channels can have archaeological implications (unless the land has been comprehensively brick earthed already as some land around Hoo St Werburgh has). The wetting project in Essex required a significant prior archaeological programme. In situ waterlogged deposits can have high archaeological and palaeo-environmental value and so a deposit model may be required to explore these aspects and to try to predict and mitigate impacts, perhaps by some sample excavations. Areas of alluvium cannot be readily evaluated by geophysics and yet have the best potential for waterlogged sites and specifically prehistoric archaeology.

The very ancient history of the river Medway and its predecessors creates Palaeolithic potential and this too needs consideration from the outset. We suggest that you engage Kent County Council Heritage Team which has relevant expertise in exploration of this.

There are very few scheduled monuments in the framework area but absence of these is not indicative of low archaeological potential. The only Scheduled Monument is Cockham Wood fort. This lies south of an area indicated as Cockham Country Park. It is an 'Heritage-at-Risk' monument on the Historic England national HAR register largely because the tidal river is slowly but steadily undermining the remains of a rare 17$^{th}$C artillery fort designed by de Gomme (Charles II's chief engineer). It may not be possible to save this part of the monument from ultimate loss but there is a recording issue of the gun levels that are most at threat. In the woodland higher than the present beach an archaeological project once cleared the trees and surveyed the landward defences which included a blockhouse – after 1667 the English were paranoid of a repeat of the Dutch raid when troops put ashore attacked from the land. These parts of the scheduled fort could be conserved and managed as a monument in any future country park. On the foreshore a hulk was proposed to be salvaged and repaired and although this has not happened it is indicative of the archaeologoical potential the intertidal zone contains.

In summary, from a historic environment point of view, we do not consider this to be a promising document as a starting point consideraing and integrating the historic environmnet into the framework for the future development of the Hoo St Werburgh expanded settlement. As outlined in the foregoing comments, we believe that there is much potential for the historic environment and heritage to contribute positively to the present and future communities of the Hoo Peninsula and the wider Medway area.

If you would like further advice on the content of this letter or to discuss how Historic England may strategic engagement in the project, please contact me. We would also encourage Medway Council to make full use of Kent County Council as your archaeological advisers.

*Yours sincerely*

[redacted]

*Alan Byrne*
Historic Environment Planning Adviser